

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BERNADETTE HIGHTOWER, LATERSHIA JONES, GEORGE DEAN, and BRUCE MARK WOODRUFF, individually, and on behalf of all others similarly situated.

### **Plaintiffs.**

VS.

## **RECEIVABLES PERFORMANCE MANAGEMENT, LLC,**

Defendant.

CASE NO.: 2:22-cv-01683-RSM

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT TO ANSWER AMENDED  
CONSOLIDATED CLASS ACTION  
COMPLAINT AND TO SUBMIT  
INITIAL DISCLOSURES AND JOINT  
STATUS REPORT AND CASE  
MANAGEMENT PLAN**

## I. STIPULATION

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs BERNADETTE HIGHTOWER, LATERSHIA JONES, GEORGE DEAN, and BRUCE MARK WOODRUFF, individually and on behalf of all others similarly situated (“Plaintiffs”) and Defendant RECEIVABLES PERFORMANCE MANAGEMENT, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs’ Consolidated Amended Class Action Complaint and for an extension of time to submit Initial Disclosures and Joint Status Report and Discovery Plan, in support thereof, state as follows:

**STIPULATION AND ORDER RE:  
EXTENSION OF TIME - 1  
NO. 2:22-cv-01683-RSM**

1       1. Plaintiffs filed their Amended Consolidated Class Action Complaint on May 4,  
2 2023. ECF No. 42.

3       2. Defendant's current due date for responding to Plaintiffs' Consolidated Class  
4 Action Complaint is August 28, 2023. ECF No. 46.

5       3. Additionally, the following deadlines for initial disclosure and submission of the  
6 Joint Status Report and Discovery Plan are in place: (1), Deadline for FRCP 26(f) Conference:  
7 September 1, 2023; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): September 8, 2023; and  
8 (3) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local  
9 Civil Rule 26(f): September 15, 2023. ECF No. 43.

10      4. As set forth in the Parties' motion to amend complaint and for an extension of  
11 time for Defendant to respond to the Amended Consolidated Class Action Complaint (ECF No.  
12 40), the Parties agreed to discuss the possibility of an early resolution, including the exchange of  
13 information to allow the Parties to evaluate the strengths and weaknesses of Plaintiff's claims  
14 and Defendant's defenses, as well as the scheduling of a mediation before Hon. Wayne Andersen  
15 (Ret.). This mediation was conducted on July 12, 2023. *See also* ECF No. 45.

16      5. Following completion of this mediation session, the Parties are continuing to  
17 engage in discussions regarding an early resolution with the assistance of the mediator. The  
18 Parties have exchanged documentation in aid of an early resolution and are continuing to discuss  
19 any early resolution of the matter with Hon. Wayne Andersen (Ret.), including the scheduling of  
20 a second day of mediation, anticipated to take place in early October.

21      6. The Parties agree that it would be beneficial to further extend the time for  
22 Defendant to answer, move or otherwise respond to Plaintiffs' Consolidated Amended  
23 Complaint while these discussions are ongoing.

24      7. As such, in light of the above and subject to Court approval, the Parties stipulate  
25 and agree that Defendant shall have an extension of time up to and including October 27, 2023 to  
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1 answer, move or otherwise respond to Plaintiffs' Consolidated Amended Class Action  
2 Complaint.

3       8. Moreover, the Parties stipulate and agree, subject to Court approval, that the  
4 deadlines for initial disclosure and submission of the Joint Status Report and Discovery Plan be  
5 extended as follows: (1), Deadline for FRCP 26(f) Conference: November 1, 2023; (2) Initial  
6 Disclosures Pursuant to FRCP 26(a)(1): November 8, 2023; and (3) Combined Joint Status  
7 Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): November  
8 15, 2023.

9           WHEREFORE, the Parties respectfully request that this stipulated motion be granted and  
10 that Defendant be granted an extension of time up to and including October 27, 2023 to answer,  
11 move or otherwise respond to Plaintiffs' Consolidated Amended Class Action Complaint, and  
12 that the deadlines for initial disclosure and submission of the Joint Status Report and Discovery  
13 Plan be extended as follows: (1), Deadline for FRCP 26(f) Conference: November 1, 2023; (2)  
14 Initial Disclosures Pursuant to FRCP 26(a)(1): November 8, 2023; and (3) Combined Joint Status  
15 Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): November  
16 15, 2023.

17           IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 25<sup>th</sup> day of  
18 August, 2023.

20 TOUSLEY BRAIN STEPHENS PLLC

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## ORDER

It is so ORDERED:

Defendant shall answer, move or otherwise respond to Plaintiffs' Consolidated Class Action Complaint on or before October 27, 2023.

The deadlines for initial disclosure and submission of the Joint Status Report and Discovery Plan per ECF No. 43 are extended as follows: (1), Deadline for FRCP 26(f) Conference: November 1, 2023; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): November 8, 2023; and (3) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): November 15, 2023.

Dated this 28<sup>th</sup> day of August, 2023.

  
RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE